

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (SN)

This document relates to:

*Ashton, et al. v. Islamic Republic of Iran*, No. 02-cv-6977 (GBD) (SN)

*Bauer, et al. v. Islamic Republic of Iran*, No. 02-7236 (GBD) (SN)

**NOTICE OF MOTION TO CORRECT**

PLEASE TAKE NOTICE that Plaintiffs in the above-captioned matters who are represented by Baumeister & Samuels, P.C., by undersigned counsel and in accordance with Fed. R. Civ. P. 60(a), respectfully request that this Court grant Plaintiffs' Motion to Correct Exhibit B to the Declaration of Dorothea M. Capone, Esq., and the Proposed Final Judgment filed July 29, 2002 at ECF Nos. 8299-2, 8300-2, 02-cv-6977, ECF Nos. 1702-2, 1703-2, 02-cv-7236, ECF Nos. 168-2 and 169-2, to correct a clerical error.<sup>1</sup> No adverse parties have appeared in this proceeding, and the Clerk issued Certificates of Default on May 12, 2006. In support of this motion, Plaintiffs submit the Declaration of Dorothea M. Capone, Esq. with corrected exhibits, and Proposed Order with corrected exhibits.

Dated: New York, New York  
September 1, 2022

Respectfully submitted,

BAUMEISTER & SAMUELS, P.C.

BY: /s/ Dorothea M. Capone  
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<sup>1</sup> References to MDL docket entries found at 03-md-1570 (S.D.N.Y.) are noted only by ECF number and references to individual civil case docket entries are preceded by the case number.